

1 Sonal N. Mehta (SBN 222086)
sonal.mehta@wilmerhale.com
2 WILMER CUTLER PICKERING
HALE AND DORR LLP
3 2600 El Camino Real, Suite 400
4 Palo Alto, CA 94306
Telephone: (650) 858-6000
5 Facsimile: (650) 858-6100

6 Joseph Taylor Gooch (SBN 294282)
taylor.gooch@wilmerhale.com
7 WILMER CUTLER PICKERING
HALE AND DORR LLP
8 50 California Street, Suite 3600
9 San Francisco, CA 94111
Telephone: (628) 235-1002
10 Facsimile: (628) 235-1001

11 *Attorneys for Non-Party*
12 *Netflix, Inc.*

13
14
15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

17 LYNWOOD INVESTMENTS CY LIMITED,
18 Plaintiff,

19 v.

20 MAXIM KONOVALOV, IGOR SYSOEV,
ANDREY ALEXEEV, MAXIM DOUNIN, GLEB
21 SMIRNOFF, ANGUS ROBERTSON, NGINX,
INC. (BVI), NGINX SOFTWARE, INC., NGINX,
22 INC. (DE), BV NGINX, LLC, RUNA CAPITAL,
Inc., EVENTURE CAPITAL PARTNERS II, LLC
23 and F5 NETWORKS, INC.,

24 Defendants.
25
26
27
28

Case No. 3:20-cv-03778-MMC (KAW)

**DECLARATION OF ED BUKOSKI
IN SUPPORT OF NETFLIX, INC.'S
ADMINISTRATIVE MOTION TO
SEAL**

1 I, Ed Bukoski, do hereby declare as follows:

2 1. I am a Senior Software Engineer on the Engineering Tools team at Netflix, Inc.
3 (“Netflix”). Among other responsibilities, I provide operations support for a wide array of
4 developer tools, including source code management and artifact management.

5 2. I make this Declaration in support of non-party Netflix, Inc.’s Administrative
6 Motion to Seal in the above-captioned matter.

7 3. My declaration in support of Netflix’s opposition to Plaintiff’s motion to compel
8 (the “MTC Declaration”) contains Netflix’s confidential information regarding its proprietary
9 technology and trade secrets. The MTC Declaration describes Netflix’s storage of archived
10 software, the manner in which the archived software is stored, and the process by which to extract
11 and review Netflix’s archived software. Examples of such confidential and proprietary
12 information include the various data sets that contain the archived software.

13 4. This information is not publicly disclosed or publicly available and has been
14 maintained by Netflix as confidential and secret and not disclosed during Netflix’s ordinary course
15 of business.

16 5. If this information was filed on the public docket, Netflix would suffer a clearly
17 defined, substantial, specific harm, including harm from competitors and bad actors. Competitors
18 could use this information to gain an advantage over Netflix with regard to how Netflix stores and
19 archives its technology along with extraction methods.

20 6. In addition, the MTC Declaration details certain security weaknesses inherent in
21 technologies discussed with that document. Malicious third parties could use that information to
22 gain access to Netflix’s data or other information. That could put both Netflix’s trade secrets as
23 well as the data of Netflix’s users, at risk.

24 7. I declare under penalty of perjury under the laws of the United States of America
25 that the foregoing is true and correct.
26
27
28

1 EXECUTED this 19th day of September, 2025 in Los Gatos, California.

2 By: 

3 Ed Bukoski

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28